

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

STACEY GALPERIN, MIRIAM ROCEK,  
HANNAH SHAFFER, HEIDI SHAFFER,  
and MARLENE DEVONSHIRE, as the  
Natural Guardian of MEGHAN DEVONSHIRE

Plaintiffs,

V.

Civil Action No. 06-359 (GMS)

DELAWARE STATE POLICE  
SERGEANT MARK DIJACOMO, BECKY  
BARRETT-TOOMEY, and ELLEN MELROSE,

## JURY TRIAL DEMANDED

Defendants.

**NOTICE OF DEPOSITION**

TO: Ralph K. Durstein III, Esquire  
Deputy Attorney General  
Carvel State Office Building  
820 N. French Street, 6<sup>th</sup> Floor  
Wilmington, Delaware 19801

Walter Nalducci, Esquire  
Cutruzzula & Nalducci  
3300 Grant Building  
Pittsburgh, PA 15219

Becky Barrett-Toomey  
5355 Library Road  
Bethel Park, PA 15102

Ellen Melrose  
1452 Beechwood Boulevard  
Pittsburgh, PA 15217

**PLEASE TAKE NOTICE** that plaintiffs will take the deposition upon oral examination of Ellen Melrose on Wednesday, February 28, 2007 at 9:00 a.m. at the offices of Rosenthal, Monhait & Goddess, P.A., 919 Market Street, Suite 1401, Citizens Bank Center, Wilmington, Delaware 19801, before an officer authorized by law to administer oaths. Testimony shall be recorded by stenographic means.

The deposition shall continue from day to day until completed. You are invited to attend and participate.

**ROSENTHAL, MONHAIT & GODDESS, P.A.**

By: 

Norman M. Monhait (#1040)  
919 Market Street, Suite 1401  
Citizens Bank Center  
P.O. Box 1070  
Wilmington, Delaware 19899-1070  
(302) 656-4433  
Email: [nmonhait@rmgglaw.com](mailto:nmonhait@rmgglaw.com)

**HANGLEY ARONCHICK SEGAL & PUDLIN**

Gordon A. Einhorn (Admitted *pro hac vice*)  
Paul W. Kaufman (Admitted *pro hac vice*)  
30 N. Third Street, Suite 700  
Harrisburg, PA 17101  
(717) 364-1004

OF COUNSEL: Attorneys for Plaintiffs

**AMERICAN CIVIL LIBERTIES UNION  
OF PENNSYLVANIA**

Mary Catherine Roper  
P.O. Box 40008  
Philadelphia, PA 19106

Witold Walczak  
313 Atwood Street  
Pittsburgh, PA 15213

Seith Kreiner  
3400 Chestnut Street  
Philadelphia, PA 19104

**AMERICAN CIVIL LIBERTIES UNION  
OF DELAWARE**

Julia Graff (#4708)  
100 W. 10<sup>th</sup> Street, Suite 309  
Wilmington, Delaware 19801

February 20, 2007

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 20<sup>th</sup> day of February, 2007, a copy of **Notice Of Deposition Of Ellen Melrose** was served, by electronic filing, upon:

Ralph K. Durstein III, Esquire  
Deputy Attorney General  
Carvel State Office Building  
820 N. French Street, 6<sup>th</sup> Floor  
Wilmington, Delaware 19801


by facsimile and first class mail, postage prepaid, upon:

Walter Nalducci, Esquire  
Cutruzzula & Nalducci  
3300 Grant Building  
Pittsburgh, PA 15219

and by Federal Express, upon:

Becky Barrett-Toomey  
5355 Library Road  
Bethel Park, PA 15102

Ellen Melrose  
1452 Beechwood Boulevard  
Pittsburgh, PA 15217

A handwritten signature in black ink, appearing to read 'Norman M. Monhait', is written over a horizontal line.

Norman M. Monhait (#1040)